

December 15, 2022

VIA CM/ECF

The Honorable Hector Gonzalez
U.S. District Court Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Wildman v. Deutsche Bank Aktiengesellschaft*, No. 21-cv-4400-HG-RML

Dear Judge Gonzalez,

Plaintiffs respectfully inform the Court that on December 13, 2022, Danske Bank pleaded guilty “and agreed to forfeit \$2 billion to resolve the United States’ investigation into Danske Bank’s fraud on U.S. banks.” U.S. Dep’t of Justice, *Danske Bank Pleads Guilty to Fraud on U.S. Banks in Multi-Billion Dollar Scheme to Access the U.S. Financial System* (Dec. 13, 2022), <https://www.justice.gov/opa/pr/danske-bank-pleads-guilty-fraud-us-banks-multi-billion-dollar-scheme-access-us-financial>. The government explained that Danske Bank “deliberately disregarded U.S. law of which it is well aware, facilitated the laundering of criminal and suspicious proceeds through the United States, and placed the U.S. financial network at risk, all in the name of its bottom line.” *Id.* Thus, “between 2008 and 2016,” Danske Bank’s Estonia business “processed \$160 billion through U.S. banks” on behalf of non-resident customers known as NRP. *Id.* Much of the money involved criminal transactions from Russia. *See id.* “Access to the U.S. financial system via the U.S. banks was critical to Danske Bank and its NRP customers, who relied on access to U.S. banks to process U.S. dollar transactions.” *Id.* Danske Bank’s management also concealed this misconduct by lying “about the state of Danske Bank Estonia’s AML compliance program, transaction monitoring capabilities, and information regarding Danske Bank Estonia’s customers and their risk profile.” *Id.* In its plea agreement, Danske Bank admitted to a statement of facts and a criminal information showing persistent misconduct since it acquired its Estonian business in 2007.

The guilty plea confirms plaintiffs’ allegations that Danske Bank knowingly operated a massive Laundromat in Estonia, which depended on purposeful availment of the U.S. financial system. The operation’s scale, duration, location, participants, and brazenness also reinforce plaintiffs’ allegations that Danske Bank’s illegal activity foreseeably allowed money launderers like Altaf Khanani and the Russian Mafia to move substantial sums of USD for the benefit of al-Qaeda, the Taliban (including its Haqqani Network), and their Syndicate allies—helping those terrorist organizations access funds they could use to attack Americans in Afghanistan.

Respectfully submitted,

s/Tejinder Singh
Counsel for Plaintiffs